

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:
City of Detroit, Michigan,
Debtor.

Chapter 9
Case No. 13-53846
Hon. Steven W. Rhodes

**Second Amended Order Establishing Procedures, Deadlines and
Hearing Dates Relating to the Debtor's Plan of Adjustment**

The City has filed a plan of adjustment and a proposed disclosure statement. To promote the just, speedy, and inexpensive determination of this case as required by Fed. R. Bankr. P. 1001, the Court hereby establishes the deadlines and hearing dates set forth below. Note: Following a hearing on the City's Motion for Approval of Disclosure Statement Procedures (Dkt. #2714), the Court will address additional disclosure statement procedures in a separate order.

Nothing herein excuses any party from the continuing obligation to participate in good faith in any mediation as ordered by Chief Judge Rosen.

Further, the Court again strongly encourages all parties to negotiate with full intensity and vigor with a view toward resolving their disputes regarding the treatment of claims in the City's plan of adjustment.

1. **February 28, 2014** is the deadline for parties to file objections to or comments regarding this order.
2. **March 14, 2014** is the deadline for any party intending to object to the disclosure statement to make a good faith effort to advise counsel for the City in writing of any request to include additional information in the disclosure statement of which such party is aware as of such date. These requests shall not be filed with the Court, nor shall a party be limited to only objecting to the disclosure statement, as provided below, based on any such requests.
3. **March 21, 2014** is the deadline for the City to file any revisions to the disclosure statement, including, without limitation, those made in response to submissions to the City made on March 14, 2014.
4. **April 1, 2014** is the deadline:
 - (a) To file objections to the proposed disclosure statement;
 - (b) For the City to designate fact and expert witnesses to be offered in support of plan confirmation, and identify the subjects each will address; and

- (c) To serve written discovery requests regarding plan confirmation. This is also the date on which depositions may commence regarding plan confirmation.

When filing an objection to the proposed disclosure statement, a party shall use the proper ECF event code for the filing.

5. **April 4, 2014** is the deadline for the City to file one combined response to all of the timely objections to the proposed disclosure statement.
6. **April 9, 2014** is the deadline for attorneys who have filed timely disclosure statement objections, to meet and confer with counsel for the City with a view toward narrowing and resolving their disputes regarding the adequacy of the disclosure statement. This “meet and confer” may be in person or by telephone. Any party whose attorney fails to timely participate in this process will be deemed to have waived its objections to the disclosure statement.

The Court strongly encourages the parties to resolve all disclosure statement objections before the hearing on the disclosure statement, and strongly discourages the parties from pursuing expensive, time-consuming and unnecessary litigation regarding the adequacy of the disclosure statement.

7. **April 11, 2014** is the deadline for the City to file a statement identifying the objections to the disclosure statement that remain after the “meet and confer” process required by paragraph 5 above.
8. **April 14, 2014 at 9:00 a.m.** shall be the date and time of the hearing on any unresolved objections to the disclosure statement.
9. **April 21, 2014** is the deadline for the City to mail plan solicitation packages and, to the extent provided in any order approving vote solicitation procedures, to provide packages to applicable DTC participants.
10. **June 1, 2014** is the deadline to comply with written discovery requests and for the City to submit expert reports.
11. **June 16, 2014** is the deadline:
- (a) To file objections to the plan; provided, that any party filing an objection may supplement such objection at the time of submission of such party’s pre-trial brief, as provided below, as and to the extent discovery occurring after such deadline, or the results of plan voting, give rise to additional or modified objections to the plan; and
 - (b) For objectors to designate fact witnesses and expert witnesses and identify the subject matter each will address.

When filing an objection to the proposed plan, a party shall use the proper ECF event code for the filing.

12. **July 16, 2014** is the deadline for the City to file one combined response to all of the timely objections to the plan, and to file a brief in support of plan confirmation.
13. **July 17, 2014** is the deadline to complete non-expert depositions.
14. **July 18, 2014 at 9:00 a.m.** shall be the date and time of the initial status conference on plan confirmation. Among other things, such status conference shall address deadlines for disclosure of exhibits and rebuttal witnesses.
15. **August 1, 2014** is the deadline:
 - (a) For plan voting;
 - (b) For objectors to submit expert reports.
16. **August 18, 2014** is the deadline to complete expert depositions.
17. **September 2, 2014** is the deadline:
 - (a) To submit a proposed joint final pretrial order in compliance with LBR 7016-1; and
 - (b) To file pretrial briefs and any supplements to plan objections.
18. **September 3, 2014** at 9:00 a.m. shall be the date and time of the final pretrial conference on plan confirmation.
19. **September 8, 2014** at 9:00 a.m. shall be the date and time for the commencement of the trial on plan confirmation. **At this hearing, in addition to any evidence addressing the factual issues raised in the parties' plan objections, the City shall present evidence establishing the feasibility of its plan as required by 11 U.S.C. § 943(b)(7).** Additional hearing dates, as necessary, will be September ___, 2014.

The dates and deadlines established herein will be extended only on motion establishing good cause.

It is so ordered.

Signed on March ___, 2014

/s/ Steven Rhodes
Steven Rhodes
United States Bankruptcy Judge